To: Keener, Bill[Keener.Bill@epa.gov]

Cc: Rao, Kate[Rao.kate@epa.gov]; Montgomery, Michael[Montgomery.Michael@epa.gov]

From: Albright, David

Sent: Wed 10/7/2015 7:34:21 PM

Subject: Updated desk statement for UIC Report to Legislature Desk Statement for DOGGR Report to Legislature Oct 2015.docx

Hi Bill,

Thanks for the input. Below and attached is the revised version. Let me know if you have other questions or comments.

Thanks, David

EPA Desk Statement for CA UIC Program - SB 855 Report to CA Legislature

October 2015

On October 8, 2015, the Division of Oil, Gas and Geothermal Resources (DOGGR) released its 2015 Underground Injection Control Program report to the California Legislature, as required by CA Senate Bill 855, enacted in 2010. The 2015 Report addresses a number of key elements regarding UIC program implementation for the period 2011-2014, and includes a detailed program assessment of issues with the UIC program focused on District 1 (Cypress, CA - Los Angeles Basin), summarized in an attachment to the 2015 annual report – "the Cypress Report".

While EPA is still reviewing the full Report, it appears to be a thorough and forthright account of past practices and shortcomings of the State's Class II UIC Program, along with numerous recommendations for program improvement. EPA is carefully considering the Report's findings, which are significant and troubling. As we continue our enhanced oversight of the CA UIC program, EPA will engage with DOGGR and the State Board to fully evaluate the implications of these new findings on the current UIC Compliance Plan and we will establish the necessary supplemental requirements to the Plan to assure protection of drinking water resources and full compliance with state and federal UIC requirements.

